

EXHIBIT 1



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September 10, 2020

VIA EMAIL

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Re: In re Dealer Management Systems Antitrust
Litig., No. 1:18-cv-000864 (N.D. Ill.)

Dear Christopher:

This letter responds to your September 9, 2020 correspondence with the Court in the above-referenced MDL (Dkt. 1170), which also refers to and attaches a prior letter dated June 18, 2020. We undertook an investigation after receiving your initial letter and determined that CDK Global, LLC has not (directly or through Mayer Brown) provided a copy of AutoMate's MDL production or the transcript from AutoMate's deposition to the Federal Trade Commission ("FTC"). Nor has CDK provided a copy of the aforementioned documents to any other party beyond those individuals and entities who are authorized to access them under Paragraphs 5(b) and 5(c) of the Agreed Confidentiality Order (Dkt. 650). Rather, from the responses that you received from counsel for MDL Plaintiffs and The Reynolds and Reynolds Company, it appears that MDL Plaintiffs provided a copy of AutoMate's deposition transcript and accompanying exhibits to the FTC in January 2019, and Reynolds provided a copy of AutoMate's MDL production and deposition transcript to the FTC after providing notice to AutoMate in May 2019 and allowing AutoMate an opportunity to object.

To the extent that any confusion arose from the fact that CDK did not separately respond to your initial June 18, 2020 inquiry, please accept our apologies for the oversight. Please take our response today into account in your communications with the Court going forward. Moreover, as there is no basis to claim that CDK has violated any obligations under the Agreed Confidentiality Order, we ask that you withdraw your request for sanctions with respect to CDK.

Regards,

/s/ Matthew D. Provance
Matthew D. Provance

cc: Counsel of Record in 1:18-cv-000864 (N.D. Ill.)